

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JAMES S. POMEROY SR., and)
JAMES S. POMEROY JR.,)
(Deceased))
Plaintiff,)
)
v.)
)
ASHBURNHAM WESTMINSTER)
REGIONAL SCHOOL DISTRICT,)
Defendant.)

C.A. NO. 03-40283FDS

DEFENDANT'S PROPOSED SCHEDULING ORDER

Defendant Ashburnham Westminster Regional School District respectfully moves the Court, pursuant to Fed.R.Civ.P. 16(b) and Local Rule 16.1 to Order the following schedule for the progress of the above referenced litigation:

Timetable for Discovery and Motion Practice

1. **Initial Disclosures.** Initial disclosures required by Fed.R.Civ.P. 26(a)(1) must be completed by February 15, 2006.
2. **Amendments to Pleadings.** Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after February 28, 2006.
3. **Fact Discovery - Interim Deadlines.**
 - a. All requests for production of documents and interrogatories must be served by March 31, 2006.
 - b. All requests for admission must be served by June 30, 2006.
 - c. All depositions, other than expert depositions, must be completed by May 31, 2006.
4. **Fact Discovery- Final Deadline.** All discovery, other than expert discovery, must be completed by June 30, 2006.

5. **Status Conference.** A status conference will be held on a date to be determined by the Court.
6. **Expert Discovery.**
 - a. Plaintiff(s)' trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by June 30, 2006.
 - b. Plaintiff(s)' trial experts must be deposed by August 16, 2006.
 - c. Defendant(s)' trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by August 31, 2006.
 - d. Defendant(s)' trial experts must be deposed by September 29, 2006.
7. **Dispositive Motions.**
 1. Dispositive motions, such as motions for summary judgment or partial summary judgment and motions for judgment on the pleadings, must be filed by October 31, 2006.
 2. Oppositions to dispositive motions must be filed within 20 days after service of the motion.
8. **Pretrial Conference.** A pretrial conference will be held on _____ at ____ am/pm.

Respectfully submitted,

The Defendant,
ASHBURNHAM WESTMINSTER REGIONAL
SCHOOL DISTRICT
By its attorney,

/s/ William P. Breen, Jr.
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Dated: January 11, 2006